

**IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

In re:

PAYLESS HOLDINGS LLC, *et al.*,  
  
Debtors.

Chapter 11

Case No. 19-40883-659

**NOTICE OF APPEARANCE AND  
REQUEST FOR SERVICE OF PAPERS**

PLEASE TAKE NOTICE that the undersigned counsel hereby appear in the above-captioned case for and on behalf of MIR Hanson Associates, LLC (the “Creditor”) for all purposes in connection with this case. The undersigned counsel hereby request service of any and all notices given or required to be given in the above-captioned case, and all papers served or required to be served in the case, and request that the names and addresses of the undersigned counsel be added to all mailing matrices in this case. Service may be made and directed as follows:

H. Seiji Newman (*pro hac vice pending*)  
Massimo Giugliano (*pro hac vice pending*)  
DAVIS & GILBERT LLP  
1740 Broadway  
New York, New York 10019  
Telephone: (212) 468-4800  
Email: hsnewman@dglaw.com  
Email: mgiugliano@dglaw.com

with a copy to:

Bonnie L. Clair  
SUMMERS COMPTON WELLS LLC  
8909 Ladue Road  
St. Louis, MO 63124  
Telephone: (314) 991-4999  
Email: blcattymo@summerscomptonwells.com (CM/ECF only)  
Email: bclair@summerscomptonwells.com (Correspondence)

PLEASE TAKE FURTHER NOTICE that the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules and the Bankruptcy Code, but also includes without limitation any notice, application, complaint, demand, motion, petition, pleading or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telex, email, electronic filing or otherwise filed or made with regard to the above-captioned case and proceedings therein, and for the purposes of CM/ECF.

This Notice of Appearance and Request for Service of Papers is without prejudice to the Creditor's rights, remedies, and claims against other entities or any objection that may be had to the subject-matter jurisdiction of the Court, and shall not be deemed or construed to submit the Creditor to the jurisdiction of the Court. All rights, remedies, and claims are hereby expressly reserved, including without limitation the Creditor's (i) right to have final orders in non-core matters entered only after *de novo* review by a District Judge, (ii) right to trial by jury in any proceeding so triable in these cases or in any case, controversy, or proceeding related to these cases, (iii) right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) right to seek a change of venue, or (v) any other rights, claims, actions, setoffs or recoupments to which the Creditor is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments the Creditor expressly reserves.

Dated: March 14, 2019

SUMMERS COMPTON WELLS LLC

By: /s/ Bonnie L. Clair  
Bonnie L. Clair, Mo. #41696  
8909 Ladue Road  
St. Louis, MO 63124  
(314) 991-4999 x340  
(314) 991-2413 facsimile  
blcattymo@summerscomptonwells.com  
(CM/ECF only)  
bclair@summerscomptonwells.com  
(Correspondence)

-and-

DAVIS & GILBERT LLP

By: /s/ H. Seiji Newman  
H. Seiji Newman (*pro hac vice pending*)  
Massimo Giugliano (*pro hac vice pending*)  
1740 Broadway  
New York, New York 10019  
Telephone: (212) 468-4800  
Facsimile: (212) 468-4888  
hsnewman@dglaw.com  
mgiugliano@dglaw.com

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing document was filed electronically on March 14, 2019 with the United States Bankruptcy Court for the Eastern District of Missouri and has been served on the parties in interest via e-mail by the Court's CM/ECF System as listed on the Court's Electronic Mail Notice List.

/s/ Christina Hauck  
Christina Hauck